

Michael Allen
 Stephen M. Dane
 John P. Relman
 Thomas J. Keary
 Pending admission *pro hac vice*
 D. Scott Chang, # 146403
 Relman & Dane, PLLC
 1225 19th Street, NW, Suite 600
 Washington, DC 20036
 Telephone: (202) 728-1888
 Fax: (202) 728-0848
Attorneys for Plaintiffs

Maxwell M. Freeman #31278
 Lee Roy Pierce, Jr. #119318
 Michael L. Gurev #163268
 Thomas H. Keeling #114979
 Freeman, D'Aiuto, Pierce
 Gurev, Keeling & Wolf, PLC
 1818 Grand Canal Boulevard, Suite 4
 Stockton, California 95207
 Telephone (209) 474-1818
 Fax: (202) 474-1245
*Attorneys for Defendants A.G. Spanos Construction, Inc.,
 A.G. Spanos Development, Inc., A.G. Spanos Land Company, Inc.,
 and A.G. Spanos Management, Inc.*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

National Fair Housing Alliance, Inc., et al.,)
)
 Plaintiffs,)
)
 v.)
)
 A.G. Spanos Construction, Inc.; et al.,)
)
 Defendants.)

Case No. C07-3255 - SBA

**JOINT APPLICATION AND
 STIPULATION TO EXTEND DATES
 FOR INITIAL CASE MANAGEMENT
 CONFERENCE AND ADR DEADLINES**

The parties to this action, by and through their respective counsel, hereby jointly
 apply for and stipulate to continue the Case Management Conference for an additional 41

1 days until December 3, 2007 or the earliest date thereafter convenient for the court. The
2 Case Management Conference is presently scheduled for October 23, 2007.

3 The parties also jointly apply for and stipulate to continue other case schedule and
4 ADR dates. The parties apply for and stipulate that the last day to meet and confer regarding
5 initial disclosures, early settlement, ADR process selection and discovery plan and the last
6 day to file the Joint ADR Certification with Stipulation to ADR Process or Notice of Need
7 for ADR Phone Conference shall be 21 days before the date of the Case Management
8 Conference. The parties also apply for and stipulate that the last day to complete initial
9 disclosures or state objection in the Rule 26(f) Report, file Case Management Conference
10 Statement and file and serve the Rule 26(f) Report shall be seven (7) days before the date of
11 the Case Management Conference.
12
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14 There is good cause to grant this joint application and stipulation. On September 11,
15 2007, Plaintiffs filed a motion for leave to amend their Complaint to add: (i.) a putative class
16 of defendants composed of current owners of apartment complexes designed and/or built by
17 the A.G. Spanos Defendants, and named representatives of this defendant class; and (ii.) The
18 Spanos Corporation as an individual defendant. The Court subsequently changed the date of
19 the Case Management Conference to October 23, 2007 to coincide with the date set for
20 hearing that motion. Without waiver or prejudice to any of their substantive and procedural
21 defenses, defendants A.G. Spanos Construction, Inc., A.G. Spanos Development, Inc., A.G.
22 Spanos Land Company, Inc. and A.G. Spanos Management, Inc. have now agreed not to
23 oppose Plaintiffs' motion for leave to amend their complaint. Assuming the Court allows
24 Plaintiffs to file their First Amended Complaint, the hearing set for October 23, 2007 is not
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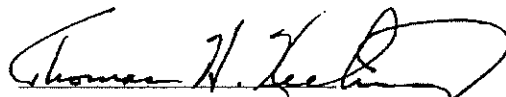
1 necessary. Added time is still necessary, however, to allow service of the Complaint on the
2 new parties and allow all parties to participate in the Case Management Conference and
3 events set forth in the preceding paragraph.
4

5 Respectfully Submitted,

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7 

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13 D. Scott Chang, Bar No. 146403
14 Relman & Dane, PLLC
15 1225 19th Street, NW, Suite 600
16 Washington DC 20036
17 Telephone: (202) 728-1888
18 Fax: (202) 728-0848
19 Attorneys for Plaintiffs

20 Dated: September 19, 2007

21
22 

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24 Lee Roy Pierce, Jr. #119318
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26 Thomas H. Keeling #114979
27 Freeman, D'Aiuto, Pierce
28 Gurev, Keeling & Wolf, PLC
29 1818 Grand Canal Boulevard, Suite 4
Stockton, California 95207
Telephone (209) 474-1818
Fax: (202) 474-1245
Attorneys for Defendants A.G. Spanos
Construction, Inc., A.G. Spanos Development,
Inc., A.G. Spanos Land Company, Inc., and
A.G. Spanos Management, Inc.

Dated: September 19, 2007

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 National Fair Housing Alliance, Inc., et al.,)

4 Plaintiffs,)

5 v.)

6 A.G. Spanos Construction, Inc.; et al.,)

7 Defendants.)
8)
9)

Case No. C07-3255 - SBA

**JOINT APPLICATION AND
STIPULATION TO EXTEND DATES
FOR INITIAL CASE MANAGEMENT
CONFERENCE AND ADR DEADLINES**

10 [PROPOSED] ORDER

11 Pursuant to the stipulation of counsel, and good cause appearing therefor, it is hereby
12 ordered that the case management conference in the above-referenced action will be
13 continued until _____, 2007 at _____. The last day to meet and confer
14 regarding initial disclosures, early settlement, ADR process selection and discovery plan and
15 the last day to file the Joint ADR Certification with Stipulation to ADR Process or Notice of
16 Need for ADR Phone Conference shall be 21 days before the date of the case management
17 conference. The last day to complete initial disclosures, file the Case Management
18 Conference Statement and file and serve the Rule 26(f) Report shall be seven (7) days before
19 the date of the case management conference.

20 Pursuant to stipulation, it is so ordered.

21 Dated: _____, 2007.

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26 Saundra Brown Armstrong
United States District Judge